

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF LOUISIANA

**BILL OF INFORMATION FOR  
WIRE FRAUD**

UNITED STATES OF AMERICA	*	CRIMINAL NO.
v.	*	SECTION:
BARBARA STEWART	*	VIOLATION: 18 U.S.C. §1343
	*	*
	*	*

The United States Attorney charges that:

**COUNT 1**

**A. AT ALL TIMES MATERIAL HEREIN:**

1. On or about August 29, 2005, Hurricane Katrina struck southeastern Louisiana and shortly thereafter a major disaster was declared. Similarly, a major disaster was declared in Louisiana as a result of Hurricane Rita, which made landfall on September 24, 2005. In response to these hurricanes and the damage inflicted upon the Southeastern Louisiana area, the American Red Cross (“Red Cross”) established assistance centers throughout the region in the late summer and early fall of 2005.

2. At these assistance centers, people affected by the storms were able to apply for a one-time only financial grant of up to \$1,565 from the Red Cross. In order to receive these funds, applicants needed to present identification to a Red Cross representative that indicated residence in an affected zone. Applicants were also asked if they had previously received financial assistance from the Red Cross and were required to attest and sign a statement that certified that the applicant had not received any other financial assistance from the Red Cross from any other assistance center.

3. Once approved, the Red Cross made these disaster assistance funds available in one of four ways: (1) A personal check made payable to the applicant, issued on-site, and cashed with the assistance of the Red Cross; (2) A Red Cross-issued “Discover” card, issued on-site, and activated via phone by the applicant; (3) A Red Cross-issued “Client Assistance Card” (“CAC”) card, issued on-site and activated via phone by the applicant; (4) A personal check authorized by the Red Cross and mailed through the United States Postal Service to an address provided by the applicant.

4. The Red Cross purchased approximately 12,500 “gift cards” from Capital One Bank, a bank with credit card services. These gift cards were “loaded” with a specific amount of money, depending upon the applicant’s qualifications. After activation, the cards were usable in a manner otherwise consistent with a debit/credit/ATM card. The authorization and tracking of purchases and withdrawals for the Capital One gift cards was performed by a third-party vendor, First Data Commercial Services (“First Data”).

5. The defendant, **BARBARA STEWART (“STEWART”)**, presented herself to Red Cross assistance centers on eight (8) occasions: on or about September 15, 2005; on or about September 19, 2005; on or about September 21, 2005; and, on or about September 28, 2005; on or about September 30, 2005; on or about October 1, 2005; on or about October 3, 2005; and on or

about October 4, 2005. On each visit, she applied for financial assistance and indicated that she had not received any other financial assistance from the Red Cross. As a result of her actions on these eight applications, the defendant, **BARBARA STEWART**, received direct financial assistance from the Red Cross in one of the four manners described above, totaling \$14,085, of which \$12,520 was fraudulently obtained.

**B.     THE SCHEME TO DEFRAUD:**

Beginning on or about September 19, 2005 and continuing through on or about December 2005, in the Eastern District of Louisiana and elsewhere, the defendant, **BARBARA STEWART**, did knowingly and willfully devise and intend to devise a scheme and artifice to defraud and to obtain money and property from the Red Cross, by means of false representations, pretenses, and promises.

**C.     THE USE OF THE WIRE:**

On or about October 3, 2005, in the Eastern District of Louisiana and elsewhere, the defendant, **BARBARA STEWART**, for the purpose of executing and attempting to execute the scheme and artifice to defraud as described in Parts A and B, did knowingly and willfully cause to be transmitted in interstate commerce certain writings, signs, signals, and sounds by means of wire communications when the defendant, **BARBARA STEWART**, used a Red Cross-issued Capital One debit/credit card numbered XXXX XXXX XXXX 9227 to obtain property, goods, services, and money in the Eastern District of Louisiana, specifically at a Regions Bank located in LaPlace, Louisiana, which caused a signal, sign, writing, and sound to be transmitted to the First Data transaction authorization server in Wilmington, Delaware, approving the transaction, resulting in the transmittal of an electronic authorization from Wilmington, Delaware back to the Regions Bank in

Laplace, Louisiana, allowing the defendant, **BARBARA STEWART**, to receive the property, goods, services, and money by the use of the falsely and fraudulently obtained Capital One debit/credit/ATM card issued to the defendant, **BARBARA STEWART**; all in violation of Title 18, United States Code, Section 1343.

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New Orleans, Louisiana  
February 12, 2008